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June 25, 2019

**VIA ECF**

Hon. Allyne R. Ross  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Runs Like Butter Inc. v. MVI Systems LLC and Samuel Taub*  
Case No. 1:19-CV-02432 (ARR)(JO)

Dear Judge Ross:

I am counsel for the defendants in the above-captioned matter and respond to plaintiff's letter of June 24, 2019 seeking to file a motion under F.R.C.P. 15(a).

Instead, plaintiff should have first contacted the undersigned who would have immediately agreed to amend the already entered Consent Order, adding the two additional domain names, the existence of which was apparently not noticed by either plaintiff or defendants. See the attached proposed Amended Consent Order. Note, the added domains already reroute to Plaintiff's website. Apparently, plaintiff seeks to continue litigating an issue that has no commercial significance whatsoever, and had none during its brief existence.

The bottom line of this dispute is that defendant has transferred control over these domain names to plaintiff, which defendants procured, innocently believing that web domain registrant had the authority and right to do so.

Entry of the attached Amended Consent judgement is respectfully requested without allowing plaintiff to unnecessarily expend litigations resources on unneeded motions and amended pleadings.

Respectfully submitted,

/s/ Max Moskowitz  
Max Moskowitz

Enclosure: Amended Consent Order

cc: Counsel for Plaintiff (via ECF)